

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ELLY DODSON, an Individual,

Plaintiff,

vs.

COSTCO WHOLESALE  
CORPORATION, a Corporation and  
DOES 1 TO 50, Inclusive

Defendants.

CASE NO.: 5:24-cv-1942-JGB-(DTBx)

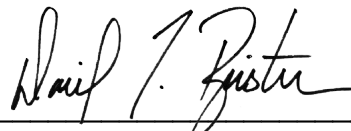
**STIPULATION AND PROTECTIVE  
ORDER- CONFIDENTIALITY  
AGREEMENT**

The Court, having reviewed the moving papers orders as follows:

- 1) Good Cause Appearing, the Court hereby approves this Stipulation and Protective Order.

**IT IS SO ORDERED.**

Dated: January 30, 2025



UNITED STATES MAGISTRAGE JUDGE

Submitted by:

DEBORAH S. TROPP, ESQ. – BAR NO. 162613 TRACY L.  
BREUER, ESQ. – BAR NO. 238687 McNEIL TROPP &  
BRAUN LLP  
2 Park Plaza, Suite 620  
Irvine, California 92614  
Phone: (949) 259-2890  
Fax: (949) 259-2891

Attorneys for Defendant,  
COSTCO WHOLESALE CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify on January 29, 2025, I electronically filed the foregoing: **[PROPOSED] ORDER GRANTING STIPULATION AND PROTECTIVE ORDER** with the Clerk of the Court for the United States District Court, Central District of California by using the Central District CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the USDC-Central District of California CM/ECF system.

I further certify that participants in the case not registered to as CM/ECF users have been served with a true and correct copy of the above described documents via email per agreement of the below party(ies), postage pre-paid, to the following non-CM/ECF participants:

Edward Cherkezian  
CARPENTER & ZUCKERMAN  
8827 West Olympic, Blvd.  
Beverly Hills, CA 90211  
ESERVICE@CZ.LAW  
[echerkezian@cz.law](mailto:echerkezian@cz.law)

Additionally, a courtesy copy was mailed to non-CM/ECF participants. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the United States Postal Service on that same day, with postage thereon fully prepaid at Irvine, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

☒ **FEDERAL:** I declare under penalty of perjury in accordance with 28 U.S.C. Section 1746 that the foregoing is true and correct.

Executed on January 29, 2025, at Newport Beach, California.

/s/ Tracy L. Breuer  
TRACY L. BREUER